

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO MMA INTERROGATORY MMA/USPS-2
(November 28, 2001)

The United States Postal Service hereby provides its response to the following interrogatories of the MMA: MMA/USPS-2, filed on November 14, 2001. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:



Frank Heselton

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November 28, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE MAJOR MAILERS ASSOCIATION**

MMA/USPS-2 Please refer to the USPS institutional response to Part E of Interrogatory MMA/USPS-T22-7, which describes why the Postal Service believes the cost pools for "MODS99, 1SUPP_F1" and "MODS, 1SUPP_F4" are not applicable or relevant, and Part D of the response to the same interrogatory.

- A. Please explain why in this proceeding the costs for (1) "MODS18, 1MISC" and "MODS 18, 1SUPPORT" are provided in 1suppf1 and (2) "MODS 48, LD48 OTH" and "MODS 48, LD48_ADM" are provided in 1suppf4, and are treated differently from the way the Commission treated them in Docket No. R2000-1, as shown in the response to Part D.
- B. Please explain why the costs for (1) "MODS18, 1MISC" and "MODS 18, 1SUPPORT" are provided in for 1suppf1 and (2) "MODS 48, LD48 OTH" and "MODS 48, LD48_ADM" are provided in 1suppf4, as shown on page 8 of Library Reference USPS-LR-J-84, but are not reported as such on page 8 of Library Reference USPS-LR-J-60.
- C. Please confirm that USPS witness Miller's proposed cost savings would increase by approximately 16% to 18% for each First-Class Automation rate category, if the Commission assumes that labor costs vary 100% with volume, as it has done for 30 years. If you cannot confirm, please explain.

Response:

See the response of the Postal Service to MMA/USPS-1.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Frank Heselton", is written over a solid horizontal line.

Frank Heselton

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